



**DEPARTMENT OF THE ARMY
MASSACHUSETTS ARMY NATIONAL GUARD TRAINING SITE
CAMP EDWARDS, MASSACHUSETTS 02542-5003**

REPLY TO
ATTENTION OF

Commander Camp Edwards:

25 January 2013

Lynne Jennings
US EPA Region 1
5 Post Office Square, Suite 100
Boston, Massachusetts 02109-3912

Dear Ms. Jennings,

The Massachusetts National Guard (MANG) is petitioning EPA Region I for modification of Administrative Order 2 (AO2) Scope of Work (SOW) issued in April 1997 in accordance with US EPA Region I EPA Docket No.: SDWA I-97-1030 (A02) page 28, Section XXXIV MODIFICATION OF THE SOW, paragraph 125:

"If the Respondent believes that a modification of the Work specified in the SOW...is necessary and appropriate, Respondent may petition to EPA for an EPA determination on such potential modification, submitting appropriate documentation. Within a reasonable time after the receipt of such petition EPA will make a determination whether the SOW should be modified. Basis for such a petition may include, but not be limited to the following...documentation demonstrating that the use of a propellant or pyrotechnic that is suspended pursuant to this order does not present a threat of harm to the public or the environment that would warrant its continued suspension under this order..."

The MANG recognizes that this item was not specifically banned under AO2. However we would request the USEPA opinion with regard to this item under AO2.

This petition specifically requests that Section 11, A., f., Response Activities, page 29 of the AO2 SOW, which "suspend(s) the following activities...All use of pyrotechnics at or near the Training Range and Impact Area" be modified to concur with the use of M228 fuse that is used with the M69 Hand Grenade Simulator, in those areas of Camp Edwards.

The Massachusetts National Guard believes the new device is an effective and environmentally safe alternative that meets EPA's modification requirements and can be responsibly used in various required training scenarios throughout the base without additional restrictions.

To support this petition we have included a basic presentation showing this device, its structure, and constituent make up.

With this pyrotechnic training tool available our local Soldiers will be able to be trained close to home with the necessary realism. This is an important goal for the MANG along with responsible stewardship and care of the environment and we appreciate your assistance to meet this goal.

Thank you for your continued cooperation and attention. If you have any questions please feel free to contact my office at any time.

Respectfully,

A handwritten signature in black ink, appearing to read 'R. Crivello', with a stylized, cursive script.

RICHARD V. CRIVELLO
COL, EN
Commanding